

**Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services**

STATEMENT OF BASIS

**Chalmette Terminal Facility
Chalmette Terminal, LLC
Chalmette, St. Bernard Parish, Louisiana
Agency Interest Number: 84724
Activity Number: PER20000001
Proposed Permit Number: 2500-00008-V0**

I. APPLICANT

Company:

Chalmette Terminal, LLC
800 Rockmead Ste 250
Kingwood, Texas 77339

Facility:

Chalmette Terminal Facility
100 Coke Plant Rd
Chalmette, LA 70043
Approximate UTM coordinates are 212.050 kilometers East and 3314.800 kilometers North, Zone 15

II. FACILITY AND CURRENT PERMIT STATUS

The Chalmette Terminal Facility operates as a bulk material handling facility, which unloads and loads green and calcined petroleum coke and stores the material on site. The coke is transferred between locations via covered conveyor systems. Calcined coke is loaded into barges or ships through retractable spouts equipped with fabric filter baghouses. Green coke is off loaded from barges using a clamshell bucket.

De-dust oil is stored in an aboveground 6,000 gallon tank until being applied to the calcined coke to minimize dust. Diesel is stored in two above ground storage tanks with volumes of 300 and 1,000 gallons. Gasoline is stored in a 300-gallon above ground storage tank.

The Chalmette Terminal Facility currently operates under Permit no. 2500-00008-02 issued June 27, 2000.

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III. PROPOSED PROJECT/PERMIT INFORMATION

Application

A permit application and Emission Inventory Questionnaire were submitted by Chalmette Terminal, LLC on May 18, 2000 requesting an initial Part 70 operating permit. Additional information dated July 20, 2000 was also received.

Project

This is the initial Part 70 operating permit for the facility.

Proposed Permit

Permit 2500-00008-V0 will be the initial Part 70 operating permit for the Chalmette Terminal Facility.

Permitted Air Emissions

Estimated emissions in tons per year are as follows:

<u>Pollutant</u>	<u>Before</u>	<u>After</u>	<u>Change</u>
PM ₁₀	22.37	22.37	-
SO ₂	-	-	-
NO _x	-	-	-
CO	-	-	-
VOC	0.82	0.82	-

Contiguous Facilities Summary:

The Chalmette Terminal is a bulk material handling facility which is contiguous and under common control with the CII Carbon, LLC's Rain CII Carbon Coke Plant. The two facilities share a common fence-line and comprise a single stationary source. The combined emissions of PM₁₀, SO₂, and NO_x for the two facilities are greater than 100 tons per year subjecting both facilities to Title V permitting requirements.

The permitted emissions and the combined emissions for each criteria pollutant from both facilities are in the table below:

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	Emissions - TPY				
	PM ₁₀	SO ₂	NO _x	CO	VOC
Chalmette Terminal, LLC - Chalmette Terminal Facility AI No. 84724; Proposed Permit No. 2500-00008-V0	22.37	-	-	-	0.82
CII Carbon LLC - Rain CII Carbon Coke Plant AI No. 2557; Permit No. 2500- 00006-V0	105.61	7008.01	319.72	-	1.35
Total / Combined Emissions	127.98	7008.01	319.72	-	2.17

IV REGULATORY ANALYSIS

The applicability of the appropriate regulations is straightforward and provided in the Specific Requirements section of the proposed permit. Similarly, the Monitoring, Reporting and Recordkeeping necessary to demonstrate compliance with the applicable terms, conditions and standards are also provided in the Specific Requirements section of the proposed permit.

This permit was reviewed for compliance with 40 CFR 70 and the Louisiana Air Quality Regulations. New Source Performance Standards (NSPS), Prevention of Significant Deterioration (PSD) and National Emission Standards for Hazardous Air Pollutants (NESHAP) do not apply.

This facility is a minor source of toxic air pollutants (TAPs) pursuant to LAC 33:III.Chapter 51.

Applicability and Exemptions of Selected Subject Items

The applicability and exemptions of the appropriate regulations are straightforward and provided in the Specific Requirements section and Briefing Sheet of the proposed permit. Similarly, the Monitoring, Reporting and Recordkeeping necessary to demonstrate compliance with the applicable terms, conditions and standards are also provided in the Specific Requirements section of the proposed permit.

Prevention of Significant Deterioration/Nonattainment Review

PSD review was not required.

MACT Requirements

The facility is a minor source of TAPs/HAPs. There are no MACT requirements.

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Air Quality Analysis

Emissions associated with the proposed permit were reviewed by the Air Quality Assessment Division to ensure compliance with the NAAQS and AAS. LDEQ did not require the applicant to model emissions.

General Condition XVII Activities

The facility will comply with the applicable General Condition XVII Activities emissions as required by the operating permit rule. However, General Condition XVII Activities are not subject to testing, monitoring, reporting or recordkeeping requirements. For a list of approved General Condition XVII Activities, refer to the Section VIII – General Condition XVII Activities of the proposed permit.

Insignificant Activities

All Insignificant Activities are authorized under LAC 33:III.501.B.5. For a list of approved Insignificant Activities, refer to the Section IX – Insignificant Activities of the proposed permit.

V. PERMIT SHIELD

A permit shield Per 40 CFR 60.6(f) and LAC 33:III.507.I has not been requested and is not included in the proposed permit.

VI. PERIODIC MONITORING

Chalmette Terminal Facility shall perform the following monitoring:

Baghouses (including gaskets): Equipment/operational data monitored by technically sound method semiannually or whenever visible emission checks indicate maintenance may be necessary. Change elements as necessary.

Filter vents: Visible emissions monitored by visual inspection/determination daily. If visible emissions are observed, restore operation of the filter to its normal or usual manner of operation as expeditiously as practicable, but at a minimum within three working days, in accordance with good air pollution control practices for minimizing emissions.

Chalmette Terminal Facility shall submit the following recordkeeping:

Baghouses: Equipment/operational data recordkeeping by electronic or hard copy upon each occurrence of inspection. Keep records of maintenance inspections on site and available for inspection by the Office of Environmental Compliance, Surveillance Division.

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Filter vents: Visible emissions recordkeeping by electronic or hard copy daily. Keep records of visible emission checks on site and available for inspection by the Office of Environmental Compliance, Surveillance Division.

VII. GLOSSARY

Carbon Monoxide (CO) – A colorless, odorless gas, which is an oxide of carbon.

Maximum Achievable Control Technology (MACT) – The maximum degree of reduction in emissions of each air pollutant subject to LAC 33:III.Chapter 51 (including a prohibition on such emissions, where achievable) that the administrative authority, upon review of submitted MACT compliance plans and other relevant information and taking into consideration the cost of achieving such emission reduction, as well as any non-air-quality health and environmental impacts and energy requirements, determines is achievable through application of measures, processes, methods, systems, or techniques.

Hydrogen Sulfide (H₂S) – A colorless inflammable gas having the characteristic odor of rotten eggs, and found in many mineral springs. It is produced by the reaction of acids on metallic sulfides, and is an important chemical reagent.

New Source Review (NSR) – A preconstruction review and permitting program applicable to new or modified major stationary sources of air pollutants regulated under the Clean Air Act (CAA). NSR is required by Parts C ("Prevention of Significant Deterioration of Air Quality") and D ("Nonattainment New Source Review").

Nitrogen Oxides (NO_x) – Compounds whose molecules consist of nitrogen and oxygen.

Organic Compound – Any compound of carbon and another element. Examples: Methane (CH₄), Ethane (C₂H₆), Carbon Disulfide (CS₂)

Part 70 Operating Permit – Also referred to as a Title V permit, required for major sources as defined in 40 CFR 70 and LAC 33:III.507. Major sources include, but are not limited to, sources which have the potential to emit: ≥ 10 tons per year of any toxic air pollutant; ≥ 25 tons of total toxic air pollutants; and ≥ 100 tons per year of regulated pollutants (unless regulated solely under 112(r) of the Clean Air Act) (25 tons per year for sources in non-attainment parishes).

PM₁₀ – Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers as measured by the method in Title 40, Code of Federal Regulations, Part 50, Appendix J.

Potential to Emit (PTE) – The maximum capacity of a stationary source to emit any air pollutant under its physical and operational design.

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Prevention of Significant Deterioration (PSD) – A New Source Review permitting program for major sources in geographic areas that meet the National Ambient Air Quality Standards (NAAQS) at 40 CFR Part 50. PSD requirements are designed to ensure that the air quality in attainment areas will not degrade.

Sulfur Dioxide (SO₂) – An oxide of sulfur.

Sulfuric Acid (H₂SO₄) – A highly corrosive, dense oily liquid. It is a regulated toxic air pollutant under LAC 33:III.Chapter 51.

Title V Permit – See Part 70 Operating Permit.

Volatile Organic Compound (VOC) – Any organic compound, which participates in atmospheric photochemical reactions; that is, any organic compound other than those, which the administrator of the U.S. Environmental Protection Agency designates as having negligible photochemical reactivity.